

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SUNPOWER CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-11649 (CTG)
)
) (Jointly Administered)
)
)
)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 25, 2024 AT 1:00 P.M. (EDT)**

**THIS PROCEEDING WILL BE CONDUCTED IN-PERSON
AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR,
COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.**

**ALL COUNSEL AND WITNESSES ARE EXPECTED TO ATTEND UNLESS
PERMITTED TO APPEAR REMOTELY VIA ZOOM.**

**PLEASE REFER TO JUDGE GOLDBLATT'S CHAMBERS PROCEDURES
([HTTPS://WWW.DEB.USCOURTS.GOV/JUDGE-CRAIG-T-GOLDBLATT](https://www.deb.uscourts.gov/judge-craig-t-goldblatt)) AND THE
COURT'S WEBSITE ([HTTP://WWW.DEB.USCOURTS.GOV/ECOURT-
APPEARANCES](http://www.deb.uscourts.gov/ecourt-appearances)) FOR INFORMATION ON WHO MAY PARTICIPATE REMOTELY,
THE METHOD OF ALLOWED PARTICIPATION (VIDEO OR AUDIO), JUDGE
GOLDBLATT'S EXPECTATIONS OF REMOTE PARTICIPANTS, AND THE
ADVANCE REGISTRATION REQUIREMENTS.**

**REGISTRATION IS REQUIRED BY 4:00 P.M. (EASTERN TIME) THE BUSINESS DAY
BEFORE THE HEARING UNLESS OTHERWISE NOTICED USING
THE ECOURTAPPEARANCES TOOL AVAILABLE ON THE COURT'S WEBSITE.**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: SunPower Corporation (8969); SunPower Corporation, Systems (8962); SunPower Capital, LLC (8450); SunPower Capital Services, LLC (9910); SunPower HoldCo, LLC (0454); SunPower North America, LLC (0194); Blue Raven Solar, LLC (3692); Blue Raven Solar Holdings, LLC (4577); BRS Field Ops, LLC (2370); and Falcon Acquisition HoldCo, Inc. (3335). The location of the Debtors' service address for purposes of these chapter 11 cases is: 880 Harbour Way South, Suite 600, Richmond, CA 94804.

I. PLAN CONFIRMATION:

1. Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates (Solicitation Version) [[Docket No. 650](#); filed September 30, 2024]

Confirmation Response/Objection Deadline: October 15, 2024 at 4:00 p.m. (EDT); extended to October 16, 2024 at 4:00 p.m. (EDT) for Chubb, 5:00 p.m. (EDT) for TotalEnergies Distributed Generation USA, LLC, and 11:59 p.m. (EDT) for various Sureties, the SEC, the Securities Litigation Plaintiff, Cigna, Hartford Insurance, the U.S. Trustee, the Committee, and the First Lien Agent

Extant Confirmation Responses/Objections Received:²

- A. Hartford Fire Insurance Company and its Affiliated Insurance Companies' Limited Objection to the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 812](#); filed October 16, 2024]

- i. Supplement to Hartford Fire Insurance Company and its Affiliated Insurance Companies' to its Limited Objection to the Amended joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [Docket No 784] [[Docket No 849](#); filed October 18, 2024]

Status: The Debtors and counsel to Hartford Fire Insurance Company are working on proposed language to attempt to resolve this objection in advance of the hearing.

- B. Limited Objection of Cigna to Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 819](#); filed October 17, 2024]

Status: The Debtors and counsel to Cigna Health and Life Insurance Company are working on proposed language to attempt to resolve this objection in advance of the hearing.

² All other confirmation objections have been previously resolved and are therefore intentionally omitted from this agenda. Based on the record of the October 18, 2024 hearing, the objections of Hartford Fire Insurance Company and Cigna Health and Life Insurance Company were both continued from October 18, 2024 to October 25, 2024.

Related Documents:

- i. Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 311](#); filed September 6, 2024]
- ii. Disclosure Statement for the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 312](#); filed September 6, 2024]
- iii. Order, Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e), Shortening the Notice Period from the Motion of Debtors for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Scheduling a Plan Confirmation Hearing and Setting Dates and Deadlines and Shortening Notice with Respect Thereto, (III) Approving the Solicitation Packages and Notice Procedures, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief [[Docket No. 410](#); filed September 16, 2024]
- iv. Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 514](#); filed September 19, 2024]
- v. Disclosure Statement for the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 515](#); filed September 19, 2024]
- vi. Notice of Redlines of (I) Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates, and (II) Disclosure Statement for the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 516](#); filed September 19, 2024]
- vii. Notice of Filing of Revised Form of that Certain “Order (I) Approving the Adequacy of the Disclosure Statement on an Interim Basis, (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing and Setting Dates and Deadlines and Shortening Notice with Respect Thereto, (III) Approving the Solicitation Packages and Notice Procedures, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief” [[Docket No. 539](#); filed September 19, 2024]
- viii. Notice of Filing of Revised Proposed Order (I) Approving the Adequacy of the Disclosure Statement on an Interim Basis, (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing and Setting Dates and Deadlines and Shortening Notice with Respect Thereto, (III) Approving the Solicitation Packages and Notice Procedures, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief” [[Docket No. 591](#); filed September 23, 2024]

- ix. Official Committee of Unsecured Creditors' Notice of Deposition of Debtor SunPower Corporation re Debtors' Plan and Disclosure Statement [[Docket No. 614](#); filed September 24, 2024]
- x. Official Committee of Unsecured Creditors' Notice of Deposition of Audrey Zibelman re Plan and Disclosure Statement Contested Matters [[Docket No. 615](#); filed September 24, 2024]
- xi. Official Committee of Unsecured Creditors' Notice of Deposition of Steven Loudon re Plan and Disclosure Statement Contested Matters [[Docket No. 616](#); filed September 24, 2024]
- xii. Official Committee of Unsecured Creditors' Notice of Deposition of Thomas Werner re Plan and Disclosure Statement Contested Matters [[Docket No. 617](#); filed September 24, 2024]
- xiii. Official Committee of Unsecured Creditors' Notice of Deposition of Vinayak Hedge re Plan and Disclosure Statement Contested Matters [[Docket No. 618](#); filed September 24, 2024]
- xiv. Notice of Service of the Official Committee of Unsecured Creditors' Discovery Requests and Deposition Notices [[Docket No. 620](#); filed September 24, 2024]
- xv. Order (I) Approving the Adequacy of the Disclosure Statement on an Interim Basis, (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing and Setting Dates and Deadlines and Shortening Notice with Respect Thereto, (III) Approving the Solicitation Packages and Notice Procedures, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief [[Docket No. 624](#); entered September 25, 2024]
- xvi. Official Committee of Unsecured Creditors' Notice of Deposition of TotalEnergies Renewables USA, LLC re Debtors' Plan and Disclosure Statement [[Docket No. 628](#); filed September 25, 2024]
- xvii. Official Committee of Unsecured Creditors' Notice of Deposition of Sol Holding, LLC re Debtors' Plan and Disclosure Statement [[Docket No. 629](#); filed September 25, 2024]
- xviii. Official Committee of Unsecured Creditors' Notice of Deposition of GIP III Sol Acquisition, LLC re Debtors' Plan and Disclosure Statement [[Docket No. 630](#); filed September 25, 2024]

- xix. Amended and Superseding Order (I) Approving the Adequacy of the Disclosure Statement on an Interim Basis, (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing and Setting Dates and Deadlines and Shortening Notice with Respect Thereto, (III) Approving the Solicitation Packages and Notice Procedures, (IV) Approving the Forms of Ballots and Notices in Connection Therewith, and (V) Granting Related Relief [[Docket No. 647](#); entered September 30, 2024]
- xx. Disclosure Statement for the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates (Solicitation Version) [[Docket No. 651](#); filed September 30, 2024]
- xxi. Notice of Hearing to Consider (I) Final Approval of the Disclosure Statement and (II) Confirmation of the Debtors' Joint Chapter 11 Plan [[Docket No. 684](#); filed October 2, 2024]
- xxii. Notice of Service [[Docket No. 685](#); filed October 2, 2024]
- xxiii. Notice of Filing of Supplement to Disclosure Statement for the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 703](#); filed October 3, 2024]
- xxiv. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of GIP III Sol Acquisition, LLC re Debtors' Plan and Disclosure Statement [[Docket No. 721](#); filed October 7, 2024]
- xxv. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of Sol Holding, LLC re Debtors' Plan and Disclosure Statement [[Docket No. 722](#); filed October 7, 2024]
- xxvi. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of Audrey Zibelman re Debtors' Plan and Disclosure Statement Contested Matters [[Docket No. 723](#); filed October 7, 2024]
- xxvii. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of Steven Loudon re Debtors' Plan and Disclosure Statement Contested Matters [[Docket No. 724](#); filed October 7, 2024]
- xxviii. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of Thomas Werner re Debtors' Plan and Disclosure Statement Contested Matters [[Docket No. 725](#); filed October 7, 2024]
- xxix. Official Committee of Unsecured Creditors' *Amended* Notice of Deposition of Vinayak Hedge re Debtors' Plan and Disclosure Statement [[Docket No. 726](#); filed October 7, 2024]
- xxx. TotalEnergies Distributed Generation USA, LLC's Notice of Deposition of SunPower Corporation [[Docket No. 733](#); filed October 8, 2024]

- xxxi. Notice of Service of TotalEnergies Distributed Generation USA, LLC's Discovery Requests and Deposition Notices [[Docket No. 734](#); filed October 8, 2024]
- xxxii. Notice of Filing of Plan Supplement [[Docket No. 742](#); filed October 8, 2024]
- xxxiii. TotalEnergies Distributed Generation USA, LLC's *Amended* Notice of Deposition of SunPower Corporation [[Docket No. 772](#); filed October 11, 2024]
- xxxiv. Notice of Rejection of Certain Cigna Contracts [[Docket No. 773](#); filed October 11, 2024]
- xxxv. Notice of Service of TotalEnergies Distributed Generation USA, LLC's Amended Notice of Deposition of SunPower Corporation [[Docket No. 778](#); filed October 14, 2024]
- xxxvi. Notice of Extension of Voting Deadline [[Docket No. 780](#); filed October 14, 2024]
- xxxvii. TotalEnergies Distributed Generation USA, LLC's *Amended* Notice of Deposition of SunPower Corporation [[Docket No. 781](#); filed October 14, 2024]
- xxxviii. Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 784](#); filed October 15, 2024]
- xxxix. Notice of Redline of Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 785](#); filed October 15, 2024]
- xl. Notice of Filing of Proposed "Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Disclosure Statement for, and Confirming the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates" [[Docket No. 801](#); filed October 16, 2024]
- xli. Witness and Exhibit List of Hartford Fire Insurance Company and its Affiliated Insurance Companies Relating to Matters Scheduled for Hearing on October 18, 2024 at 2:30 p.m. [[Docket No. 805](#); filed October 16, 2024]
- xlii. Witness and Exhibit List of TotalEnergies Distributed Generation USA, LLC for the Hearing on October 18, 2024 at 2:30 p.m. (ET) [[Docket No. 806](#); filed October 16, 2024]

- xliii. Amended Witness and Exhibit List of Hartford Fire Insurance Company and its Affiliated Insurance Companies Relating to Matters Scheduled for Hearing on October 18, 2024 at 2:30 p.m. [[Docket No. 813](#); filed October 16, 2024]
- xliv. Debtors' Witness and Exhibit List for the Hearing Scheduled on October 18, 2024 at 2:30 p.m. (EDT) [[Docket No. 814](#); filed October 16, 2024]
- xl v. Letter Requesting Permission for Witness to Appear at Hearing Remotely [[Docket No. 824](#); filed October 17, 2024]
- xlvi. Amended Letter to Court Requesting Permission for Witness to Appear at Hearing Remotely [[Docket No. 825](#); filed October 17, 2024]
- xl vii. Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates (Technical Modifications) [[Docket No. 829](#); filed October 17, 2024]
- xl viii. Notice of Redline of Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 831](#); filed October 17, 2024]
- xl ix. Notice of Filing of Revised Proposed "Findings of Fact, Conclusions of Law, and Order Approving the Debtors' Disclosure Statement for, and Confirming the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates" [[Docket No. 832](#); filed October 17, 2024]
- l. Debtors' Memorandum of Law in Support of an Order (I) Approving the Debtors' Disclosure Statement on a Final Basis and (II) Confirming the Debtors' Joint Chapter 11 Plan [[Docket No. 833](#); filed October 17, 2024]
- li. Declaration of Matthew Henry, Chief Transformation Officer of SunPower Corporation, in Support of (I) Final Approval of the Disclosure Statement and (II) Confirmation of the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 834](#); filed October 17, 2024]
- lii. Declaration of Stephenie Kjontvedt of Epiq Corporate Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots Cast on the Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 835](#); filed October 17, 2024]
- liii. Notice of Filing of First Amended Plan Supplement [[Docket No. 847](#); filed October 18, 2024]
- liv. *Amended* Debtors' Witness and Exhibit List for the Hearing Scheduled on October 18, 2024 at 2:30 p.m. (EDT) [[Docket No. 848](#); filed October 18, 2024]

- iv. Notice of Filing of Further Revised Proposed “Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates” [[Docket No. 864](#); filed October 18, 2024]
- lvi. Findings of Fact, Conclusions of Law, and Order Approving the Debtors’ Disclosure Statement for, and Confirming the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [[Docket No. 872](#); filed October 18, 2024]
- lvii. Supplemental Declaration of Carrie Redding in Support of Hartford Fire Insurance Company and its Affiliated Insurance Companies’ Limited Objection to the Amended Joint Chapter 11 Plan of SunPower Corporation and its Debtor Affiliates [Docket No. 784] [[Docket No. 906](#); filed October 23, 2024]

Hartford Fire Insurance Company Witness Information:

- A. Carolyn Redding, Consulting Financial Analyst with The Hartford Financial Services Group, Inc.

Status: The hearing on this matter solely with respect to objections (A) and (B) listed above will go forward.

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Dated: October 23, 2024
Wilmington, Delaware

/s/ Jason M. Madron

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